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Hearing Date: October 19, 2010 at 10 a.m.
Objection Due Date: July 12, 2010

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION
(Substantively Consolidated)

**OPPOSITION TO THE TRUSTEE'S MOTION TO AFFIRM HIS DETERMINATIONS
DENYING CLAIMS OF CLAIMANTS WITHOUT BLMIS ACCOUNTS IN THEIR
NAMES, NAMELY, INVESTORS IN FEEDER FUNDS**

Pursuant to this Court's order of April 13, 2010 (Docket Number 2205), scheduling adjudication of the "customer" issue (the "Scheduling Order"), Diane and Rober Peskin, Maureen Ebel and a large group of other customers (the "Customers")¹ respectfully submit this opposition to the motion filed by the Trustee (Docket Number 2416) (the "Customer Motion").

¹ A portion of Becker & Poliakoff LLP's clients are listed on Exh. A to Helen Davis Chaitman's declaration in support of this opposition.

The Customers seek leave of this Court to submit Helen Davis Chaitman's declaration to clarify the scope of the Customer Motion so as not to prejudice the hundreds of investors through non-feeder fund group accounts whose entitlement to "customer" status under the Securities Investor Protection Act was specifically preserved for litigation at a later date.

Based on the foregoing, the Customers respectfully request that the Court expressly limit its holding on the Customer Motion to the specific feeder funds named by the Trustee in his motion papers.

Dated: New York, New York
July 12, 2010

BECKER & POLIAKOFF LLP

By: /s/ Helen Davis Chaitman
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